

The VerStandig Law Firm, LLC**1452 W. Horizon Ridge Pkwy, #665****Henderson, NV 89012****Phone: 301-444-4600**

Invoice submitted to:

Eagle Properties and Investments LLC**Invoice # 10929**

Invoice Date: 05/18/24

Terms: COD

Services Through: 05/18/24

Due Date: 05/18/24

Description Single invoice for Eagle Properties and Investments LLC

Date	By	Service Summary	Hours/Qty	Rate	Amount
In Reference To: Chief Restructuring Officer					
09/22/23	Mac VerStandig	Call with Tranzon agent and J. Martin re scheduled auction for Richmond property and potential auction of other properties	0.50	450.00	\$225.00
09/22/23	Mac VerStandig	Call with J. Martin, following call with Tranzon, re potential use of retail brokerage to sell residential properties	0.10	450.00	\$45.00
09/30/23	Mac VerStandig	E-mail to contact at Axos Bank re opening DIP account	0.10	450.00	\$45.00
10/01/23	Mac VerStandig	E-mail to R. Patrick re transition	0.10	450.00	\$45.00
10/02/23	Mac VerStandig	Exchange e-mails with L. Perez at Axos Bank re DIP account	0.10	450.00	\$45.00
10/04/23	Mac VerStandig	Review form of purchase agreement from auction of Williamsburg asset	0.20	450.00	\$90.00
10/04/23	Mac VerStandig	Exchange e-mails with D. Musgrave re insurance of 213 N. Port	0.10	450.00	\$45.00
10/05/23	Mac VerStandig	E-mails with L. Perez re Axos Bank delay in setting up DIP account	0.10	450.00	\$45.00
10/06/23	Mac VerStandig	Review and execute documents requisite to open DIP account	0.40	450.00	\$180.00
10/07/23	Mac VerStandig	Send signature specimen to bank	0.20	450.00	\$90.00
10/09/23	Mac VerStandig	Exchange e-mails with R. Patrick re status of opening DIP account	0.10	450.00	\$45.00
10/10/23	Mac VerStandig	Review e-mail from Axos Bank promising to have DIP account opened by day's end	0.10	450.00	\$45.00
10/11/23	Mac VerStandig	Exchange e-mails with Axos Bank re delay in getting DIP account opened	0.10	450.00	\$45.00
10/11/23	Mac VerStandig	Call with C. Palik re Pennsylvania property and plans to place same on market for sale	0.10	450.00	\$45.00
10/12/23	Mac VerStandig	Review emails with C. Palik and J. Martin re 363 sale/plan sale and timing issues; Email J. Martin to approve contemplated scheme	0.10	450.00	\$45.00
10/14/23	Mac VerStandig	Review N. Green compensation application	1.40	450.00	\$630.00

Exhibit A - Time and Expense Records Page 2 of 7

Date	By	Service Summary	Hours/Qty	Rate	Amount
10/19/23	Mac VerStandig	Review MainStreet Bank payable and attempt to set up wire transfer per call with counsel for creditor; E-mail to counsel explaining wire anomaly and discussing remedial measures to be undertaken	0.30	450.00	\$135.00
10/20/23	Mac VerStandig	Review e-mail from counsel for MainStreet Bank re wire issue and call counsel to discuss same	0.10	450.00	\$45.00
10/23/23	Mac VerStandig	Review e-mail from D. Musgrave re payments and call D. Musgrave re same	0.10	450.00	\$45.00
10/27/23	Mac VerStandig	Call with C. Rogan re equity position on properties, potential plan contours, sale of properties, and composition of creditor pool	0.40	450.00	\$180.00
10/28/23	Mac VerStandig	Call with D. Borowy, Redfin Agent, re listing of 15474 Roxbury, bankruptcy-centric issues attendant to same, contemplated price range, and issues with potential need to evict tenants	0.30	450.00	\$135.00
10/28/23	Mac VerStandig	E-mail to D. Borowy (realtor) and J. Martin re listing of Roxbury property	0.10	450.00	\$45.00
10/28/23	Mac VerStandig	Call with J. Hawkins, real estate agent, re 1001 Manning Drive (7 mins); Follow up e-mail to J. Hawkins and J. Martin re same (3 mins)	0.20	450.00	\$90.00
10/28/23	Mac VerStandig	Call with M. Toland, Redfin realtor, re listing N. Port properties	0.20	450.00	\$90.00
10/29/23	Mac VerStandig	E-mail to M. Toland (realtor) and J. Martin re 202 & 213 N. Port	0.10	450.00	\$45.00
11/02/23	Mac VerStandig	Call with J. Martin and J. Reid re collection of rent, itemization of debts to be paid as post-petition admin expenses, need to evict certain tenants, properties to be sold, property taxes to be paid, and next steps	0.30	450.00	\$135.00
11/05/23	Mac VerStandig	Review insurance bills and e-mails concerning same, paying various open invoices and accounting for said payments	1.30	450.00	\$585.00
11/05/23	Mac VerStandig	Reconcile State Farm payments by address for entry into Quickbooks (.4) and then reconcile Quickbooks ledger against Axos statement for October 2023 (.3)	0.70	450.00	\$315.00
11/20/23	Mac VerStandig	Review Baltimore City, Howard County, and Dauphin County tax obligations as well as municipal tax records and pay taxes on each property in the foregoing jurisdictions, accounting for said payments while making the subject payments	1.20	450.00	\$540.00
11/20/23	Mac VerStandig	Make adequate protection payments to MainStreet Bank and Virginia Partners Bank	0.40	450.00	\$180.00
11/20/23	Mac VerStandig	Call with J. Martin re deposits into DIP account, size of property tax payments being made, need to obtain details underlying procurement of funds transferred by A. Jain, stay relief motion filed by client of C. Rogan, potential cash/accrual oddities with MOR for October 2023, and timing for docketing of adversary complaint	0.30	450.00	\$135.00
11/22/23	Mac VerStandig	Review SC&H compensation application, including detailed review of line item time entries	2.10	450.00	\$945.00

Exhibit A - Time and Expense Records Page 3 of 7

Date	By	Service Summary	Hours/Qty	Rate	Amount
11/24/23	Mac VerStandig	Review records from prior CRO as well as bank statements and ledger, so as to ascertain information requisite to complete August and October 2023 monthly operating reports, drafting said reports in the process of so doing (1.8); Draft notes to accompany reports (.5); Redact bank statements to accompany reports (.2); Use Quickbooks to produce financials to accompany October 2023 report (.2)	2.70	450.00	\$1,215.00
11/24/23	Mac VerStandig	Review budget and opposition to motion to convert	0.50	450.00	\$225.00
11/24/23	Mac VerStandig	Exchange e-mails with R. Patrick re September DIP statement and Quickbooks records	0.10	450.00	\$45.00
11/26/23	Mac VerStandig	Review draft adversary complaint against Bala Jain LLC	0.90	450.00	\$405.00
11/27/23	Mac VerStandig	Multiple calls to Erwin Insurance re reinstating policies of insurance or procuring new policies for lapsed properties (18 minutes spread over four calls); Review certificates of insurance and coverage information (.2); Record payments in client ledger (.1)	0.60	450.00	\$270.00
11/27/23	Mac VerStandig	Review insurance ledger and juxtapose same to properties indicated by counsel to be in question; Produce print off of ledger and print off of correlative electronic checks to show premiums have been paid	0.40	450.00	\$180.00
11/27/23	Mac VerStandig	Call with D. Musgrave re adequate protection payments	0.10	450.00	\$45.00
11/27/23	Mac VerStandig	Exchange e-mails with H. Hutman re adequate protection payments	0.10	450.00	\$45.00
11/28/23	Mac VerStandig	Call with D. Musgrave re administrative solvency of estate, administrative claims being filed, anticipated contours of plan	0.30	450.00	\$135.00
11/28/23	Mac VerStandig	Call with J. Martin during recess from hearing re hearing progress, UST quarterly fees	0.20	450.00	\$90.00
11/28/23	Mac VerStandig	Call with J. Martin following hearing re ruling and next steps in case	0.20	450.00	\$90.00
11/29/23	Mac VerStandig	Review e-mail from David Musgrave and collect BPOs/appraisals on Fulton lien assets to e-mail him (.3); Draft and send response, including discussion of Richmond asset and potential short sale with carve out (.2)	0.50	450.00	\$225.00
11/29/23	Mac VerStandig	Review e-mail from C. Jones re unpermitted work in Pennsylvania properties and respond to same with inquiry as to who undertook subject work	0.20	450.00	\$90.00
11/29/23	Mac VerStandig	Review fee applications of Whiteford Taylor and Jeff Martin	0.60	450.00	\$270.00
12/07/23	Mac VerStandig	Review tax information for 445 Windover (including breakdown of taxes due for various time periods), assess whether same can be paid online, interfacing with eccentric county web portal, and coordinate payment by bank check while accounting for same	0.40	450.00	\$180.00
12/17/23	Mac VerStandig	Review e-mail from counsel re 363 sale of property in Virginia and respond to same	0.10	450.00	\$45.00

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Date	By	Service Summary	Hours/Qty	Rate	Amount
12/17/23	Mac VerStandig	Pay utility bills, municipal obligations, and MainStreet Bank December adequate protection obligation, inputting utility providers' data into bill payment system alongside pertinent account numbers, working through municipal payment website, coordinating wire to cleaning/lawn care provider, and coordinating wire to MainStreet Bank; Make appropriate accounting entries for each, simultaneously, while tending to payment	1.60	450.00	\$720.00
12/17/23	Mac VerStandig	Draft November monthly operating report, including preparation of accompanying notes, production of financial statements, and redaction of bank statement	1.40	450.00	\$630.00
12/17/23	Mac VerStandig	Reconcile payments into DIP account from AirBNB (.4) and A. Jain (.9), reviewing A. Jain e-mail to break down split allocation of rental payments and creating property-specific accounts for each, while also reviewing AirBNB property and payment records to ensure payments are tracked to proper assets and booked with proper data	1.30	450.00	\$585.00
12/18/23	Mac VerStandig	Review and pay invoice for tree removal on Williamsburg Road	0.20	450.00	\$90.00
12/18/23	Mac VerStandig	Exchange e-mails with E. Schuster re December adequate protection payment and N. Port eviction	0.10	450.00	\$45.00
12/18/23	Mac VerStandig	Review Orrstown Bank loan status and e-mails from F. Wilburn; Coordinate payment of adequate protection monies	0.40	450.00	\$180.00
12/19/23	Mac VerStandig	Attend hearing on various professional fee applications (no charge for travel or wait time; was present in court for unrelated matter)	0.30	450.00	\$135.00
12/26/23	Mac VerStandig	Meeting (virtual) with counsel and equity holder re disposition of properties in plan of reorganization	0.50	450.00	\$225.00
12/26/23	Mac VerStandig	Call with Pennsylvania insurer re status of four policies and facilitation of ongoing payment of premiums for same	0.10	450.00	\$45.00
01/08/24	Mac VerStandig	Review e-mails re approval of Williamsburg sale	0.10	450.00	\$45.00
01/08/24	Mac VerStandig	Review e-mail from R. Patrick attaching bank statements as well and review bank statements	0.20	450.00	\$90.00
01/10/24	Mac VerStandig	Discussion with counsel re plan of reorganization	0.10	450.00	\$45.00
01/12/24	Mac VerStandig	Read plan and disclosure statement	1.40	450.00	\$630.00
01/21/24	Mac VerStandig	Review e-mails from counsel and use same to identify adequate protection payments to be made	0.20	450.00	\$90.00
01/21/24	Mac VerStandig	Make adequate protection payments by check and wire, updating ledger in process	0.90	450.00	\$405.00
01/21/24	Mac VerStandig	Review recent account activity and reconcile same	0.30	450.00	\$135.00
01/22/24	Mac VerStandig	Continue making adequate protection payments via check and wire	0.40	450.00	\$180.00
01/22/24	Mac VerStandig	Draft December monthly operating report, including production of financial reports and drafting of accompanying notes	1.30	450.00	\$585.00
01/22/24	Mac VerStandig	Multiple calls with D. Musgrave re properties to be covered by payments to Fulton Bank, treatment of properties being abandoned/sold, and sum of adequate protection obligation	0.40	450.00	\$180.00
01/22/24	Mac VerStandig	E-mail to A. Jain re second DIP account	0.10	450.00	\$45.00
01/23/24	Mac VerStandig	Attend hearing on motion to convert and various fee applications	1.70	450.00	\$765.00

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Date	By	Service Summary	Hours/Qty	Rate	Amount
01/25/24	Mac VerStandig	Call with H. Hutman re adequate protection payment application (.1); Review ledger and notes, e-mailing H. Hutman in follow up to call (.2)	0.30	450.00	\$135.00
01/26/24	Mac VerStandig	Call with insurer on four Pennsylvania properties re premiums and renewals	0.10	450.00	\$45.00
01/26/24	Mac VerStandig	Review and sign contract for sale of 3002 Williamsburg Road (contract is only 3 pages and had been previously reviewed - .1 time entry is not a typo)	0.10	450.00	\$45.00
01/30/24	Mac VerStandig	E-mail to A. Jain re need to review Bank United statements	0.10	450.00	\$45.00
01/31/24	Mac VerStandig	Revise December MOR, review same, collate documents, and e-mail to J. Martin in filing-ready format	1.30	450.00	\$585.00
01/31/24	Mac VerStandig	Review Bank United statements from A. Jain and examine same to assess potential issues with debtor's utilization of a second DIP account, history of debits and credits, and various delineated transactions	1.30	450.00	\$585.00
01/31/24	Mac VerStandig	Read amended plan and disclosure statement	1.00	450.00	\$450.00
02/06/24	Mac VerStandig	E-mail to D. Musgrave breaking down allocation of payment, including review of prior e-mails and payment records to ensure accuracy of same	0.40	450.00	\$180.00
02/06/24	Mac VerStandig	Review bank records and e-mail A. Jain re need to make rental payments	0.30	450.00	\$135.00
02/12/24	Mac VerStandig	Review e-mail from A. Jain re payments and assess degree of tardiness in various rental payments, examining records to assess A. Jain's obligations	0.80	450.00	\$360.00
02/23/24	Mac VerStandig	Prepare January operating report, including redaction of bank statement, preparation of accompanying notes, completion of form, and updating of financial figures	1.50	450.00	\$675.00
02/23/24	Mac VerStandig	Reconcile bank account	0.30	450.00	\$135.00
02/23/24	Mac VerStandig	Review statements and activity from DIP account maintained by A. Jain	0.30	450.00	\$135.00
02/23/24	Mac VerStandig	Exchange e-mails with A. Jain re VRBO payment details	0.10	450.00	\$45.00
02/26/24	Mac VerStandig	Review e-mails re Williamsburg closing	0.10	450.00	\$45.00
02/29/24	Mac VerStandig	Review sale agreement for Lucy property and e-mail realtor asking to have language inserted regarding need for court approval	0.50	450.00	\$225.00
02/29/24	Mac VerStandig	Review order on Shore adequate protection and e-mail counsel re need to obtain wire instructions	0.20	450.00	\$90.00
02/29/24	Mac VerStandig	Review e-mail from A. Jain re payments and reconcile same against banking records	0.30	450.00	\$135.00
03/01/24	Mac VerStandig	Review notice of insurance cancellation for Linglestown Road property (.1); E-mail A. Jain and counsel re same (.1); Notify UST re same (.1); E-mail realtor to assess speed with which property can be sold (not mentioning cancellation but being mindful of time before cancellation becomes effective) (.1); and assess strategy for either selling or abandoning asset, insofar as one or other needs to occur before cancellation becomes effective (.2)	0.60	450.00	\$270.00
03/04/24	Mac VerStandig	Review Cottage Street contract (.3); Call with D. Musgrave re same (.1)	0.40	450.00	\$180.00
03/04/24	Mac VerStandig	Facilitate payment to G. Goldsmith	0.30	450.00	\$135.00

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Date	By	Service Summary	Hours/Qty	Rate	Amount
03/05/24	Mac VerStandig	Review offers, assess same in light of BPOs obtained, review comps in market, and e-mail legal team and realtor re acceptance of offers on Linglestown, Chocolate, Fairville, and Berkstone	1.30	450.00	\$585.00
03/05/24	Mac VerStandig	Review e-mail from H. King re insurance coverage for four properties	0.10	450.00	\$45.00
03/08/24	Mac VerStandig	Review e-mail re Lynn property being a gravesite (.1); Call with counsel re same (.1); Review photos of graves and assess impact on asset (.1); Begin to assess potential obligations attendant to operating property with historic graves thereupon, title implications of same, and potential easement concerns (.8); Call with counsel for G. Goldsmith (secured lender on subject property) re graves (.1)	1.20	450.00	\$540.00
03/11/24	Mac VerStandig	Call with Erwin Insurance re 1635 Church Road and procurement of policy to cover same for ensuing six months	0.50	450.00	\$225.00
03/11/24	Mac VerStandig	Call with D. Musgrave re forthcoming hearings	0.10	450.00	\$45.00
03/11/24	Mac VerStandig	Call with H. Hutman re adequate protection payment and upcoming hearing on motions to approve disclosure statement and convert/dismiss case	0.10	450.00	\$45.00
03/11/24	Mac VerStandig	Update books and records, including entry of adequate protection and insurance payments	0.70	450.00	\$315.00
03/12/24	Mac VerStandig	Attend hearing on motion to convert; Confer with counsel before and after hearing; Travel to and from hearing	3.50	450.00 NC	\$0.00
03/19/24	Mac VerStandig	Call with counsel following hearing on motion to reconsider	0.10	450.00	\$45.00
03/19/24	Mac VerStandig	Update corporate ledger and reconcile same, in preparation for turnover to trustee	0.60	450.00	\$270.00
03/20/24	Mac VerStandig	Draft detailed transition memorandum for trustee, while awaiting appointment of trustee	1.90	450.00	\$855.00

In Reference To: **Chief Restructuring Officer (Expenses)**

02/20/24	Mac VerStandig	UPS Store (Grand Junction, CO) charges for notarizing deed, printing/scanning deed, and shipping deed to closing agent	1.00	131.60	\$131.60
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Total Hours:	53.20
Total Labor:	\$22,365.00
Total Expenses:	\$131.60
Total Invoice Amount:	\$22,496.60
Total Amount Due:	\$22,496.60

User Summary

User	Hrs	Rate	Amount
Mac VerStandig	49.70	@ 450.000	22,365.00
Mac VerStandig	3.50	@ N/C	0.00

Trust Account

The Trust Activity shown here is from the previous Invoice date of to the latest payment applied to this invoice which is 05/18/24

Date	Trust Account	Description	Debit	Credit	Balance
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Matter : Non-Matter Related

Eagle Propertie- Trust Account

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	Eagle Propertie- Trust Account Opening balance	0.00	0.00	0.00
09/19/23	Eagle Propertie- Trust Account Retainer from A. Jain	0.00	15,000.00	15,000.00
11/06/23	Eagle Propertie- Trust Account Retainer from A. Jain	0.00	5,000.00	20,000.00
11/16/23	Eagle Propertie- Trust Account Retainer from A. Jain	0.00	4,000.00	24,000.00
12/01/23	Eagle Propertie- Trust Account Retainer payment (from A. Jain)	0.00	3,000.00	27,000.00
12/07/23	Eagle Propertie- Trust Account Retainer payment (from A. Jain)	0.00	3,000.00	30,000.00

Trust account ending balance as of 05/18/24 for Eagle Propertie- Trust Account: 30,000.00

Trust account ending balance as of 05/18/24 for Non-Matter Related: 30,000.00

Total for Eagle Properties and Investments LLC: 30,000.00